



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604**

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Land Comp Landfill, Ottawa, Illinois

FROM: Brianna Fenzl, Environmental Engineer
AECAB (IL/IN)

THRU: Nathan Frank, Section Supervisor
AECAB (IL/IN)

TO: File

BASIC INFORMATION

Facility Name: Land Comp Landfill (Land Comp)

Facility Location: 2840 E 13th Rd, Ottawa, Illinois

Date of Inspection: June 2, 2022

EPA Inspector(s):

1. Brianna Fenzl, Environmental Engineer
2. Karina Kuc, Environmental Scientist
3. Alexandra Letuchy, Environmental Engineer

Other Attendees:

1. Eric Dippon, Environmental Manager, Land Comp Landfill
2. Jim Chalfin, Operations Supervisor, Land Comp Landfill

Contact Email Address: e.dippon@republicservices.com

Purpose of Inspection: Determine compliance with the Clean Air Act and perform a comparative Surface Emissions Monitoring (SEM) survey

Facility Type: Municipal Solid Waste (MSW) Landfill

Regulations Central to Inspection: 40 CFR 62 Subpart OOO; 40 CFR 63 Subpart AAAA; Permit Requirements

Arrival Time: 11:25 AM

Departure Time: 3:25 PM

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Presented Credentials
- ☒ Stated authority and purpose of inspection
- ☒ Small Business Resource Information Sheet not provided. Reason: Not a small business
- ☒ Provided CBI warning to facility

The following information was obtained verbally from Land Comp unless otherwise noted.

Process Description:

Land Comp is a municipal solid waste (MSW) landfill located in Ottawa, Illinois. Land Comp opened in the early 1990s. The landfill consists of 25 acres, 30 gas collection wells, and one flare. There are 8 acres under final cover. A 200 x 100-foot area is active on the northwest corner, and everything else is intermediate cover. The 30 wells are in intermediate cover.

Land Comp accepts approximately 800 tons of waste per day. The makeup of waste is around 30% MSW and 70% construction and demolition.

Historically there has never been water in the wells and liquid level measurements are taken twice a year. Leachate is collected and pumped to a tank and taken to the city of Ottawa wastewater treatment plant by truck. Land Comp produces about 100,000 to 150,000 gallons of leachate per year.

There is one approximately 600 standard cubic feet per minute (scfm) capacity flare on site. Land Comp operates the flare always unless it is down due to power outage, in which case, a deviation report will be submitted.

Staff Interview:

There are 5 Land Comp employees on site. Quarterly SEM is performed at Land Comp by a third-party consultant, Civil and Environmental Consultants. Land Comp told EPA that it has been a few years since detecting any exceedances. Their SEM procedure includes deviating from the path and including penetrations.

There have been no recent odor complaints for Land Comp.

Land Comp's closure estimate is in about 30 years.

TOUR INFORMATION

EPA Tour of the Facility: Yes

Data Collected and Observations:

Two EPA inspectors performed Method 21 SEM at the landfill with one inspector assisting with notes and GPS equipment. Land Comp confirmed readings made by EPA inspectors.

Methane values that were higher than 500 parts per million (ppm) are considered an exceedance. There was a total of 23 exceedances found and documented by EPA, most of which were found in areas where no wells were present.

Dead vegetation was found at the landfill on the southeast slope, roughly in 10–20-foot areas. Three photos documented visible trash.

Brianna Fenzl used TVA #A413C2 until 2:20 PM, then Alexandra Letuchy completed the monitoring with the instrument.

Photos and/or Videos: were taken during the inspection.

- See Appendix A.

Field Measurements: were taken during this inspection.

- See Appendix B.

CLOSING CONFERENCE

☒ Provided U.S. EPA point of contact to the facility

Concerns: EPA inspectors informed Land Comp of methane leaks found during the inspection.

DIGITAL SIGNATURES

Report Author: Brianna Fenzl 8/8/2022

Section Supervisor: _____

APPENDICES AND ATTACHMENTS

1. Appendix A: Digital Image Log
2. Appendix B: Field Measurement Data

Facility Name: Land Comp Landfill
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APPENDIX A: DIGITAL IMAGE LOG

1. Inspector Name: Alexandra Letuchy and Brianna Fenzl	2. Archival Record Location: Inspection Photos
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Image Number	File Name	Date and Time (incl. Time zone and DST)	Description of Image
1	P6020001.JPG	6/2/22, 11:59:04 AM CST	Exceedance 2
2	P6020002.JPG	6/2/22, 12:02:20 PM CST	Exceedances 3, 4
3	P6020003.JPG	6/2/22, 12:06:52 PM CST	Exceedance 5
4	P6020004.JPG	6/2/22, 12:37:48 PM CST	Visible Trash near 307IM4
5	P6020005.JPG	6/2/22, 12:38:04 PM CST	Visible Trash near 307IM4
6	P6020006.JPG	6/2/22, 12:38:10 PM CST	Visible Trash near 307IM4
7	P6020007.JPG	6/2/22, 12:46:50 PM CST	Exceedance 9
8	P6020008.JPG	6/2/22, 12:52:56 PM CST	Exceedance 10
9	P6020009.JPG	6/2/22, 12:55:52 PM CST	Exceedances 11, 12
10	P6020010.JPG	6/2/22, 12:58:34 PM CST	Exceedance 13
11	P6020011.JPG	6/2/22, 1:03:58 PM CST	Exceedance 14
12	P6020012.JPG	6/2/22, 1:12:10 PM CST	Exceedance 15
13	P6020013.JPG	6/2/22, 1:22:30 PM CST	Exceedance 16
14	P6020014.JPG	6/2/22, 1:25:20 PM CST	Exceedance 17
15	P6020015.JPG	6/2/22, 1:30:32 PM CST	Exceedance 18

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16	P6020016.JPG	6/2/22, 1:32:52 PM CST	Exceedance 19
17	P6020017.JPG	6/2/22, 1:35:01 PM CST	Exceedance 20
18	P6020018.JPG	6/2/22, 1:36:50 PM CST	Exceedance 21
19	P6020019.JPG	6/2/22, 1:38:12 PM CST	Exceedance 22

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APPENDIX B: FIELD MEASUREMENT DATA

Calibration with 0, 500, 2000, 1% ppm methane gas, done by EPA at 10:00 AM

Calibration Gas (ppm)	Methane Reading (ppm)	
	TVA #SL1555	TVA #A413C2
500	504	483
2000	2011	2017
1.0%	1.02%	1.02%

Calibration Gas Information

Calibration Gas (ppm)	Lot #	Manufacturer	Expiration
Zero	1501788	CalGaz	June 2026
500	1440910	CalGaz	June 2026
2000	1434290	CalGaz	June 2026
1.0%	1440891	CalGaz	June 2026

Background methane data, done by EPA. NW Wind at 14 mph

	ppm
Upwind	3.1
Downwind	13

Bump check data with 500 ppm methane gas, done by EPA after SEM

Calibration Gas (ppm)	Methane Reading (ppm)	
	TVA #SL1555	TVA #A413C2
500	465	497
2000	1930	2020
1.0%	1.01%	1.03%

Exceedance Measurements, done by EPA SEM

Exceedance	Location	ppm (or %) VOC as methane	EPA Inspector with TVA	TVA ID #	Confirmation Reading	Land Comp Confirmed
1	Well 1L1/14	770	Brianna Fenzl	#A413C2	690	Yes
2	Cover in between well 14 and 10B	1004	Karina Kuc	#SL1555	640	Yes
3	Cover in between well 14 and 10 B	930	Karina Kuc	#SL1555	503	Yes
4	Cover in between well 14 and 10B	1500	Karina Kuc	#SL1555	1570	Yes

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5	Cover in between well 14 and 10B	6953	Karina Kuc	#SL1555	1.18%	Yes
6	Well 7A	1900	Karina Kuc	#SL1555	1487	Yes
7	Between 7A and 305A	1%	Karina Kuc	#SL1555	2055	Yes
8	Well 3A	4049	Brianna Fenzl	#A413C2	1700	Yes
9	Cover near 307A	1258	Brianna Fenzl	#A413C2	1100	Yes
10	15 ft diameter near dead vegetation	840	Karina Kuc	#SL1555	1099	Yes
11	Similar dead vegetation area as Exceedance 10, all elevated	1100	Karina Kuc	#SL1555	3033	Yes
12	Similar dead vegetation area as Exceedance 10, all elevated	760	Brianna Fenzl	#A413C2	1200	Yes
13	Similar dead vegetation area as Exceedance 10, all elevated	1500	Karina Kuc	#SL1555	6032	Yes
14	41.342141°, - 88.900561°	1200	Karina Kuc	#SL1555	638	Yes
15	5 ft diameter near 23A	1%	Karina Kuc	#SL1555	3336	Yes
16	41.342480°, - 88.900644°	690	Alexandra Letuchy	#A413C2	922	Yes
17	41.342609°, - 88.900531°	1%	Karina Kuc	#SL1555	1905	Yes
18	41.342596°, - 88.900499°	584	Karina Kuc	#SL1555	-	Yes
19	41.342714°, - 88.900564°	1050	Alexandra Letuchy	#A413C2	1376	Yes
20	41.342758°, - 88.900616°	800	Karina Kuc	#SL1555	584	Yes
21	41.342850°, - 88.900561°	1290	Karina Kuc	#SL1555	999	Yes
22	41.342918°, - 88.900525°	1085	Karina Kuc	#SL1555	680	Yes
23	41.342935°, - 88.900440°	2000	Karina Kuc	#SL1555	1680	Yes